

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

CHASOM BROWN, WILLIAM BYATT,  
JEREMY DAVIS, CHRISTOPHER  
CASTILLO, and MONIQUE TRUJILLO,  
individually and on behalf of all similarly  
situated,

Plaintiffs,

v.

GOOGLE LLC,  
Defendant.

Case No. 5:20-cv-03664-LHK-SVK

**[PROPOSED] ORDER GRANTING  
MOTION TO SEAL**

Referral: Hon. Susan van Keulen, USMJ

**[PROPOSED] ORDER**

Before the Court is Plaintiffs' Administrative Motion to File Documents Under Seal (Dkt. 291) seeking to seal certain materials submitted to the Court in connection with Plaintiffs' Motion Seeking Relief For Google's Failure To Obey Discovery Order ("Motion Seeking Relief") (Dkt. 292). Having considered the motion to seal, supporting declarations, and pleadings on file, and good cause having been found, the Court **ORDERS** as follows:

Documents Sought to Be Sealed	Court's Ruling on Motion to Seal	Reason(s) for Court's Ruling
Motion Seeking Relief (Dkt. 291-2)	GRANTED as to redacted portions at:  Page 1 Lines 6-11 Page 2 Lines 25-27 Page 3 Lines 1-4, 21-22 Page 5 Lines 17, 23 Page 8 Lines 3-5 Page 9 Lines 11, 16 Page 10 Lines 9-11 Page 11 Lines 14-17 Page 12 Lines 1, 11, 13 Page 14 Lines 17, 19, 22-27 Page 15 Lines 1-10	Narrowly tailored to protect confidential technical information regarding the operation of Google's products and systems, including the various types of Google's internal identifiers/cookies and their proprietary functions, the various types of logs maintained by Google, and information contained in those logs, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.

1 2 3 4 5 6 7	Exhibit E to the Declaration of Erika Nyborg-Burch in support of the Motion Seeking Relief (Dkt. 291-7)	GRANTED as to redacted portions at: Pages 1-2.	Narrowly tailored to protect confidential technical information regarding the operation of Google's products and systems, including the various types of Google's internal identifiers/cookies and their proprietary functions that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
8 9 10 11 12	Exhibit F to the Declaration of Erika Nyborg-Burch in support of the Motion Seeking Relief (Dkt. 291-8)	GRANTED as to the document in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's operations and consumer data, including Google's internal data storage infrastructure, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
13 14 15 16 17 18 19 20	Exhibit H to the Declaration of Erika Nyborg-Burch in support of the Motion Seeking Relief (Dkt. 291-9)	GRANTED as to redacted portions at:  Pages 2, 4	Narrowly tailored to protect confidential technical information regarding the operation of Google's products and systems, including the various types of Google's internal identifiers/cookies and their proprietary functions, the various types of logs maintained by Google, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
21 22 23 24 25 26 27 28	Exhibit I to the Declaration of Erika Nyborg-Burch in support of the Motion Seeking Relief (Dkt. 291-10)	GRANTED as to redacted portions at:  Page 2	Narrowly tailored to protect confidential technical information regarding the operation of Google's products and systems, including the various types of Google's internal identifiers/cookies and their proprietary functions, the various types of logs maintained by Google, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.

Exhibit J to the Declaration of Erika Nyborg-Burch in support of the Motion Seeking Relief (Dkt. 291-11)	GRANTED as to the document in its entirety	Narrowly tailored to protect confidential technical information regarding the operation of Google's products and systems, including the various types of Google's internal identifiers/cookies and their proprietary functions, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
Exhibit K to the Declaration of Erika Nyborg-Burch in support of the Motion Seeking Relief (Dkt. 291-12)	GRANTED as to redacted portions at:  Pages 1-3, 5-12	Narrowly tailored to protect (1) confidential technical information regarding the operation of Google's products and systems, including the various types of Google's internal identifiers/cookies and their proprietary functions, the various types of databases maintained by Google, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors and (2) Plaintiffs' sensitive information.
Exhibit L to the Declaration of Erika Nyborg-Burch in support of the Motion Seeking Relief (Dkt. 291-13)	GRANTED as to redacted portions at:  Pages 2-9	Narrowly tailored to protect (1) confidential technical information regarding the operation of Google's products and systems, including the various types of Google's internal identifiers/cookies and their proprietary functions, the various types of databases maintained by Google, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors and (2) Plaintiffs' sensitive information.

**SO ORDERED.**

DATED: \_\_\_\_\_

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THE HONORABLE SUSAN VAN KEULEN  
United States Magistrate Judge